

FITCHBURG GAS AND ELECTRIC LIGHT COMPANY

D.T.E. 03-26

SECOND SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF  
TELECOMMUNICATIONS AND ENERGY TO  
FITCHBURG GAS AND ELECTRIC LIGHT COMPANY

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Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Fitchburg Gas and Electric Light Company (“Fitchburg” or “Company”) the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning

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documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary L. Cottrell, Secretary of the Department and on all parties; also submit two (2) copies of the responses to John Geary, Hearing Officer; and one (1) copy of the responses to Robert Harrold, Assistant Director, Electric Power Division.
8. In addition to filings, all non-proprietary responses should be submitted by e-mail to [dte.efiling@state.ma.us](mailto:dte.efiling@state.ma.us) and to the e-mail address of any party required to be served.
9. Responses are due on or before November 20, 2003.

INFORMATION REQUESTS

- DTE 2-1 Please refer to the Company’s 2001 performance incentive reconciliation, Exh. 1, line 13. With respect to the Residential Efficiency (REP 1)/RCS Pilot program, Fitchburg reports an achievement level of 114,459 kilowatthours (“KWH”). Briefly describe the method(s) used to estimate this achievement level, and include any and all data and sources of data, assumptions, analytical techniques, or statistical tests employed.
- DTE 2-2 Please refer to the Company’s 2001 performance incentive reconciliation, Exh. 1, line 24. With respect to the Residential Low Income 1 program, Fitchburg claims a shareholder incentive based on holding multiple training sessions for customer service representatives. Provide complete and detailed documentation to support that claim.

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- DTE 2-3 Please refer to the Company's 2001 Performance Incentive Reconciliation, Exh. 1, line 26. With respect to the Low Income 3 program, Fitchburg claims a shareholder incentive based on proportional funding of a hired consultant. Provide complete and detailed documentation to support that claim.
- DTE 2-4 Please refer to the Company's 2001 Performance Incentive Reconciliation, Exh. 1, line 33. With respect to the Small Commercial & Industrial 1 Program, Fitchburg claims a shareholder incentive based on an achievement level of 234,812 KWH. Briefly describe the method(s) used to estimate this achievement level, including any data and sources of data, assumptions, analytical techniques, or statistical tests employed.
- DTE 2-5 Please refer to the Company's 2001 Performance Incentive Reconciliation, Exh. 1, line 36. With respect to the Comprehensive Efficiency 1 Program, Fitchburg claims a shareholder incentive based on an achievement level of 2,896,531 KWH. Briefly describe the method(s) used to estimate this achievement level, including any data and sources of data, assumptions, analytical techniques, or statistical tests employed.
- DTE 2-6 Please refer to the Company's 2002 Performance Incentive Reconciliation, Exhs. 1 and 2, and to the Company's response to DTE 1-7(a). With respect to the Energy Star Appliance 3 Program, Fitchburg claims a shareholder incentive based on a market share of 25 percent for clothes washers. Briefly describe the method(s) used to estimate this market share, including any data and sources of data, assumptions, analytical techniques, or statistical tests employed.
- DTE 2-7 Please refer to the Company's 2002 Performance Incentive Reconciliation, Exhs. 1 and 2, and Exh. D.T.E. 1-7(a). With respect to Efficient Program Delivery - Residential, Fitchburg claims a shareholder incentive based on an achievement level of 18.97 KWH. Briefly describe the method(s) used to estimate this achievement level, including any data and sources of data, assumptions, analytical techniques, or statistical tests employed.
- DTE 2-8 Please refer to the Company's 2002 Performance Incentive Reconciliation, Exhs. 1 and 2, and Exh. DTE 1-7(b). With respect to the Small Commercial & Industrial 1 Program, Fitchburg claims a shareholder incentive based on an achievement level of 167,722 KWH. Please briefly describe the method(s) used to estimate this achievement level, including any data and sources of data, assumptions, analytical techniques, or statistical tests employed.

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- DTE 2-9 Please refer to the Company's 2002 Performance Incentive Reconciliation, Exhs. 1 and 2, and to the Company's response to DTE 1-7(b). With respect to the Comprehensive Efficiency 1 Program, Fitchburg claims a shareholder incentive based on an achievement level of 1,713,051 KWH. Please briefly describe the method(s) used to estimate this achievement level, including any data and sources of data, assumptions, analytical techniques, or statistical tests employed.
- DTE 2-10 Please refer to the Company's 2002 Performance Incentive Reconciliation, Exhs. 1 and 2, and to the Company's response to DTE 1-7(b). With respect to Efficient C&I Program Delivery 1, Fitchburg claims a shareholder incentive based on an achievement level of 45.01 KWH. Please briefly describe the method(s) used to estimate this achievement level, including any data and sources of data, assumptions, analytical techniques, or statistical tests employed.
- DTE 2-11 Please refer to (1) the D.T.E. 98-100 Final Guidelines, §§ 3 and 4; and (2) the Company's 2001 Performance Incentive Reconciliation at 1-2. Provide a final cost/benefit ratio for the 2001 energy efficiency programs shown at 1-2.
- DTE 2-12 Please refer to (1) the D.T.E. 98-100 Final Guidelines, §§ 3 and 4; and (2) the 2002 Performance Incentive Reconciliation, at 1-3. Provide a final cost/benefit ratio for the 2002 energy efficiency programs shown at 1-3.